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July 6, 2021

BY ECF

Honorable Stewart D. Aaron
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED. The Clerk of Court is respectfully requested to mail a copy of this Order to the *pro se* Plaintiff. SO ORDERED.

Dated: July 6, 2021

Stewart D. Aaron

Re: B. Braxton/Obed-Edom v. City of New York, et al.
17-cv-0199 (GBD) (SDA)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department representing the defendants in the above-referenced action. I write respectfully to request a two-day extension of defendants' time to file their motion for summary judgment from July 6, 2021 to July 8, 2021. Should the Court grant the requested extension, it should similarly extend plaintiff's time to file opposition to the summary judgment motion from July 27 to July 29, 2021 and defendants' time to serve its reply from August 3 to August 5, 2021. I have not requested the *pro se* plaintiff's consent to this request as he is incarcerated at the Auburn Correctional Facility and therefore cannot be reached expeditiously.

The extra time is needed because I have been out of the country over the past two weeks assisting my parents with health care needs. As the Court may be aware, the Law Department identified unauthorized access within its IT environment recently, which resulted in computer systems being taken off-line and staff being unable to access systems, including not only email, but also electronic files. This disruption hampered my ability to access critical documents needed for the motion while out of the country. Unfortunately, I also encountered additional technical issues upon my return to the office today, which have prevented me from timely completing the motion.

In view of the foregoing, I respectfully request that the Court grant the requested extension of the briefing dates by two days such that defendants' time to file their motion for

summary judgment from July 6, 2021 to July 8, 2021 plaintiff's time to file opposition to the summary judgment motion from July 27 to July 29, 2021 and defendants' time to serve its reply from August 3 to August 5, 2021.

I thank the Court for its consideration herein.

Respectfully submitted,

s/ *Steve Stavridis*

Steve Stavridis
Senior Counsel

cc: B. Braxton/Obed-Edom (by first-class mail)
Auburn Correctional Facility
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